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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 3, 2011

Mr. Bill Wessel
Smith and Wessel Associates, Inc
8 Church Street
Merrimac, Massachusetts 01860

Re: PCB Self Implementing Cleanup and Disposal Plan
Leominster High School, Leominster, Massachusetts

Dear Mr. Wessel:

Smith and Wessel Associates, Inc submitted a PCB self-implementing cleanup and disposal notification under § 761.61(a) to address PCB contaminated building materials at Leominster High School located at 122 Granite Street, Leominster, Massachusetts (the Site), on behalf of the City of Leominster.

With respect to Notification, EPA has determined that the notification is incomplete and does not meet the notification requirements at 40 CFR § 761.61(a)(3). The PCB Regulations at § 761.61(a) require that a complete notification in accordance with 40 CFR § 761.61(a)(3) be submitted to EPA.

GENERAL COMMENTS

1. The sampling that was conducted is insufficient to support a PCB cleanup plan under 40 CFR § 761.61(a). Additional sampling is recommended so that nature and extent of the PCB contamination can be established. In addition, the laboratory reporting limits are too high to determine the classification of the PCB-contaminated materials. See specific comments below.
2. All information required under § 761.61(a)(3) was not provided. See specific comments below.

SPECIFIC COMMENTS

1. It is unclear who will be responsible for the work proposed under this plan. The Notification indicates that the plan is being provided on behalf of the Purchasing Agent, Leominster City Hall. However, clarification is required on who will be responsible for the proposed work on behalf of the City. Thus, please provide the name, title, and contact information for the person and the entity that will be responsible for the proposed PCB abatement work.
2. Section 761.61(a)(3)(i)(E) requires that an owner's certification be submitted with the Notification. No certification was found in the Notification.
3. Page 1. Fiber board, concrete and brick would all be classified as *porous surfaces*. Sampling for *porous surfaces* should be conducted on a bulk basis, not a surface area basis. EPA notes that the only post-remediation sampling proposed is wipe sampling, which would not be appropriate for *porous surfaces*.
4. The Notification appears to distinguish between PCB caulk with greater than or equal to (\geq) 50 parts per million (ppm) from PCB caulk with less than ($<$) 50 ppm. The Notification also seems to infer the 50 ppm is the acceptable EPA limit for caulk. Please be aware that $<$ 50 ppm PCB caulk and $<$ 50 ppm PCB remediation waste may also be regulated for removal and/or cleanup unless the $<$ 50 ppm PCB caulk meets the definition of an *Excluded PCB Product* as defined at § 761.3. Unless the City of Leominster can document that this caulk meets the *Excluded PCB Product* criteria, this caulk would be regulated under 40 CFR Part 761 for removal and/or cleanup.
5. With respect to the previous comment 4 above, EPA notes that the laboratory detection limit for many of the caulks sampled was greater than ($>$) 1 ppm. Thus, these detection limits may not be sufficient to ascertain the regulatory status of these products.
6. Based on the information provided, EPA cannot ascertain if the samples that were collected adequately represent the various types of caulk present in the building, both interior and exterior. EPA would recommend that the caulks be assessed based on caulk type and location (e.g. exterior versus interior; door versus window versus expansion joint, color) and any other characteristics that could be used to distinguish between the caulks.
7. The Notification should include more information on the quantity of the various types of PCB caulk present in addition to the quantities of the various building substrates (e.g. # of windows and doors and linear footage of caulk associated with each type; linear footage of expansion joints, etc).
8. With respect to the air sampling results, the TO-10A method is an acceptable air method. However, it is unclear why the analysis only addressed PCB Aroclors. EPA generally recommends that the air analysis be either for PCB homologues or PCB congeners. Based on the information provided, there is a potential that the PCB air concentrations are higher if the PCBs are not in the dust fraction but rather in the vapor fraction.

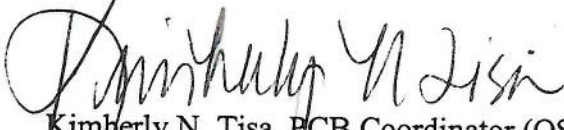
9. Table 2 – For Sample No. 6, the table indicates that the PCB result is 57 ng/m³; however, the laboratory report indicates that the PCB result is 0.57 µg/m³, which translates to 570 ng/m³, not 57 ng/m³. If the reported result is correct, the PCB concentration in the indoor air exceeds EPA's recommended concentration of 450 ng/m³ for adults 19 years and older.
10. Page 6, Section 1.3 – The Notification indicates that substrate samples were collected at no more than 2-inches thick.
 - a. The sampling procedure described is inconsistent with EPA's concrete SOP, which establishes a 0.5-inch depth interval for porous surfaces not 2-inches.
 - b. Based on the sampling procedure employed, EPA can make no determination on the nature/extent of the PCB contamination into the surrounding substrates.
 - c. For certain porous substrates, such as the concrete block, the extent of the PCB contamination was not established and thus it is impossible to determine what the best cleanup plan for the PCB-contaminated substrates would be.
11. The Notification does not indicate if soil sampling was conducted adjacent to exterior caulk joints. At other similar sites, EPA has seen a high potential for PCB contamination to soils located in close proximity to a caulk joint. EPA would recommend sampling of soils at caulk joints and/or drip lines.
12. Page 13. Section 4.2. Since the work will be conducted throughout the school year, will warning tape be sufficient to keep students from entering the area?
13. Page 13. Section 4.3. Waste containers should be marked according to §761.40.
14. Page 13 – The described work practices only indicate that containment will be used on the interior of the building. Generally for these types of projects and given the use of the building, exterior containment is generally used, especially for tasks that would result in high dust concentrations.
15. Page 14.
 - a. As previously indicated, based on the data collected-to-date, EPA does not believe that there is sufficient information to support the proposed remedial plan. Further, Section 5.2 references only *non-porous surfaces*. It is clear that the PCB-contaminated substrates include *porous surfaces*.
 - b. Section 5.2. Bullet two. EPA believes this solvent reference should be Capsur by Integrated Chemistries.

16. Page 15, Section 5.3 – Verification sampling will need to include bulk sampling, not just wipe sampling. The PCB cleanup standard would be less than or equal to (≤ 1 ppm for building *porous surfaces* without further restriction. For non-porous surfaces, the PCB cleanup standard generally would be $\leq 1 \mu\text{g}/100 \text{ cm}^2$ for schools. See previous specific comment 3.
17. Page 16, Section 6.1. Container marking requirements are located in §761.40. Storage requirements are found in §761.65.
18. Page 17, Sections 7.2 and 7.3
 - a. See previous specific comment 9 on indoor air sampling results.
 - b. Given that insufficient data on nature/extent of PCB contamination has been presented, it is unclear what the actual cost of the remediation would be. Thus, insufficient information exists to say that the costs would be “extraordinary”.
 - c. The Notification appears to specify Sikagard 62 for substrate encapsulation. It is unclear if this encapsulant could be used on an interior application due to its properties. Further, it is unclear if this decision is being left to the contractor or if the final decision on the appropriate and acceptable encapsulant will be made by the City. Please clarify.
 - d. For encapsulated surfaces, post-encapsulation surface wipe sampling would be required to verify the effectiveness of the encapsulation.
 - i. Please note that EPA generally requires that the PCB concentrations in the wipe samples be $\leq 1 \mu\text{g}/100 \text{ cm}^2$, not $\leq 10 \mu\text{g}/100 \text{ cm}^2$ for encapsulated surfaces.
 - ii. For purposes of determining the sampling frequency for encapsulated surfaces, the sampling will need to include all types of encapsulated substrates. This is not clear in the proposed plan under Section 7.2
19. Little information regarding means and methods for PCB removal/storage/disposal is provided in the Notification. Much of the detail appears to be left to the contractor. Thus, please be aware that EPA will require submittal of a contractor work plan for review and approval. The work plan will also need to include information on air monitoring and action levels. If the contractor will not be responsible for the air monitoring, this information and action levels will need to be provided in the Notification.
20. If encapsulation is used, a Long Term Monitoring and Maintenance Plan (MMIP) will be required in addition to the Deed Restriction.

21. EPA notes that the proposed PCB remedial work will occur over multi-phases and over several years. Accordingly, EPA will require that a communications plan be developed for school users to describe the work and to keep users apprised of the progression of the work. At other school sites, fact sheets, information meetings, and development of a web page for the project have been used to support this effort.

Should you have any questions regarding the above or questions on the PCB regulations found at 40 CFR Part 761, please feel free to call me at (617) 918-1527 or Katherine Woodward at (617) 918-1353.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kimberly N. Tisa".

Kimberly N. Tisa, PCB Coordinator (OSRR07-2)
Remediation & Restoration II Branch

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